

1 KENNER LAW FIRM, P.C.
2 David E. Kenner, SBN 41425
3 Brett A. Greenfield, SBN 217343
4 16000 Ventura Boulevard, PH 1208
5 Encino, CA 91364
6 818 995 1195
7 818 475 5369 - fax

5 WADE, KELLY & SULLIVAN
6 733 W. 4th Avenue, Suite 200
7 Anchorage, Alaska 99501
8 (907) 561-7743
9 (907) 562-8977 - fax

8 Attorney for Defendant Josef F. Boehm

9 IN THE UNITED STATES DISTRICT COURT

10 DISTRICT OF ALASKA

11

12 Sally C. Purser,)
13 Plaintiff,) THIRD PARTY COMPLAINTS
14 v.)
15 Josef F. Boehm, Allen K.)
16 Bolling, and Bambi Tyree,)
17 Defendants.) CASE NO.: A05-0085 (JKS)
18 _____)
19

20 THIRD PARTY COMPLAINT FOR EQUITABLE APPORTIONMENT AND INDEMNITY

21 A. PARTIES

22 1. Josef F. Boehm is a resident of Anchorage, Alaska, Third
23 Judicial District, at Anchorage.
24
25 2. Carl Bucher, now deceased, was at all relevant times, a
26 resident of Anchorage, Alaska, Third Judicial District at
27 Anchorage.
28

- 1 3. Allan Bolling was at all relevant times, a resident of
- 2 Anchorage, Alaska, Third Judicial District at Anchorage.
- 3 4. Leslie Williams was at all relevant times, a resident of
- 4 Anchorage, Alaska, Third Judicial District at Anchorage.
- 5 5. Jay Harrison and Roberta Harrison, husband and wife, was
- 6 at all relevant times, a resident of Spokane, Washington.
- 7 6. Kathleen Purser was at all relevant times, a resident of
- 8 Anchorage, Alaska, Third Judicial District at Anchorage.
- 9 7. Bambi Tyree was at all relevant times, a resident of
- 10 Anchorage, Alaska, Third Judicial District at Anchorage.
- 11 8. Jay Whaley was at all relevant times, a resident of
- 12 Anchorage, Alaska, Third Judicial District at Anchorage.
- 13 9. Deborah Axt was at all relevant times, a resident of
- 14 Anchorage, Alaska, Third Judicial District at Anchorage.

16 B. EQUITABLE APPORTIONMENT

- 17 10. Josef F. Boehm is a resident of Anchorage, Alaska and is
- 18 fully qualified to maintain his claims for equitable
- 19 apportionment and indemnity.
- 20 11. Pursuant to Federal Rule of Civil Procedure 14(a), Josef
- 21 F. Boehm hereby names Bambi Tyree, Kathleen Purser, Al
- 22 Bolling, Leslie Williams, Jay Whaley, estate of Carl
- 23 Bucher, Jay Harrison, Roberta Harrison and Deborah Axt as
- 24 third parties whose fault may have been the cause of the
- 25 damages claimed by Salley Purser, including but not
- 26 limited to her claimed mental and emotional distress and
- 27 physical harm resulting from that distress.
- 28

1 defendants to this action.

2 17. Prior to, during and/or following the time that Salley
3 Purser associated with Josef Boehm, Ms. Purser exchanged
4 sex for controlled substances with one or more of the
5 named third-party defendants to this action.

6 18. Prior to, during and/or following the time that Salley
7 Purser associated with Josef Boehm, Ms. Purser assisted
8 one or more of the named third-party defendants to this
9 action in enlisting females to have sex and use
10 controlled substances with one or more of the named
11 third-party defendants to this action.

12 19. Prior to, during and/or following the time that Salley
13 Purser associated with Josef Boehm, Ms. Purser engaged
14 in criminal behavior and/or assisted in criminal
15 enterprises with one or more of the named third-party
16 defendants to this action, including but not limited to
17 theft, prostitution, use, purchase, sale and manufacture
18 of cocaine including crack cocaine, and assault on Josef
19 Boehm and others.

20 20. Salley Purser, if she suffered damages, suffered those
21 damages that she currently alleges are the responsibility
22 of Josef Boehm, including all damages prayed for in Ms.
23 Purser's Amended Complaint and all consequential and
24 incidental damages, as a result of the actions of one or
25 more of the named third-party defendants, whether acting
26 alone or conspiring with one another.

27 21. Pursuant to Alaska Statute 9.17.080, one or more of the

named third-party defendants, and not Josef Boehm, are responsible to Salley Purser for the damages alleged in Ms. Purser's Amended Complaint.

C. INDEMNITY

1. Josef Boehm re-alleges the allegations set forth in Paragraphs 1 - 12 of this Third - Party Complaint as though fully set forth herein.
2. To the extent that Josef Boehm suffers damages and/or is obligated to pay Salley Purser for damages she incurred as a result of her claims, one or more of the named third-party defendants were ultimately responsible for said damages. Accordingly, one or more of the named third-party defendants have a duty to indemnify Josef Boehm.

WHEREFORE, Josef Boehm seeks the following relief:

- a. For apportionment of damages to one or more of the third - party defendants for any amount of damages awarded to Salley Purser in this matter.
- b. For Josef Boehm's actual legal costs and reasonable attorneys fees incurred in bringing this Third - Party Complaint.
- c. For such other and further relief as the Court may deem just, proper and equitable.

DATED this 20th day of April, 2007 at Encino, California.

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3 KENNER LAW FIRM
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6 By: _____/s/ _____
7 David E. Kenner
8 California 41425
9 16000 Ventura Blvd.
10 Penthouse 1208
11 Encino, California 91436
12
13
14 By: _____/s/ _____
15 Brett A. Greenfield
16 California 217343
17 16000 Ventura Blvd.
18 Penthouse 1208
19 Encino, California 91436
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